

September 1, 2016

VIA EMAIL

Ms. Terri Blunk
Chemical Risk Information Branch
EPA Region 7
11201 Renner Boulevard
Lenexa, KS 66219
blunk.terri@epa.gov

Re: General Duty Clause Semi-Annual Report
Coffeyville Resources Refining & Marketing, LLC (CRRM)
Civil Action Number 11-CV-1291-JTM-JPO
United States District Court, District of Kansas, Consent Decree entered July 2, 2013

Dear Ms. Blunk:

Pursuant to correspondence between the United States and CRRM, dated May 2, 2013 through May 9, 2013, CRRM is submitting the attached semi-annual report, updating EPA on the corrective actions CRRM has taken to address the findings of its General Duty Clause ("GDC") audit. The attached progress report covers the period dated February 1, 2016 to July 31, 2016.

As discussed in its dated June 27, 2014 GDC audit submission, CRRM does not believe that any of the violations or findings discovered during CRRM's Program Audit, Vessel Audit, or HF Alky Audit constitute violations of the GDC. However, as a precaution, CRRM submitted each of those audit findings as GDC audit findings. Accordingly, CRRM's progress report under the GDC agreement mirrors its progress report under the above referenced Consent Decree.

If there are questions, or additional information is required, please contact me at 620/252-4535.

Sincerely,



Darin Rains
Vice President and Refinery General Manager

Enclosure

cc: John Walter, Esquire (via electronic mail)
Ms. Janice DeVelasco (via electronic mail)
Mr. Dennis Irwin (via electronic mail)
LeAnn Johnson Koch, Esquire (via electronic mail)



CERTIFIED MAIL RETURN RECEIPT REQUESTED

September 1, 2016

Mr. W. Benjamin Fisherow
Chief, Environmental Enforcement Section
U.S. Department of Justice
P.O. Box 7611, Ben Franklin Station
Washington, D.C. 20044-7611
Reference Case No 90-5-2-1-07459/1

Re: **Semi-Annual Report**
Coffeyville Resources Refining & Marketing, LLC (CRRM)
Civil Action Number 11-CV-1291-JTM-JPO
United States District Court, District of Kansas, Consent Decree entered July 2, 2013

Dear Mr. Fisherow:

Pursuant to Section VIII, Paragraph 26 of the referenced Consent Decree and the Semi-Annual Reporting Clarification letter from Ms. Sarah LaBoda dated August 28, 2013, CRRM is submitting the semi-annual report for the period from February 1, 2016 to July 31, 2016.

Copies are being provided to the Chief, Chemical Risk Information Branch and Office of Regional Counsel at Region 7 of the Environmental Protection Agency as described in Section XV.

If there are questions, or additional information is required, please contact Dennis Irwin at 620/252-4612 or me at 620/252-4295.

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on any personal knowledge I may have and my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

A handwritten signature in blue ink, appearing to read "Darin L. Rains".

Darin L. Rains
Vice President and Refinery General Manager

Enclosure

Copy:

Patrick Bustos (via overnight mail)
Chief, Chemical Information Branch
EPA Region 7
11201 Renner Blvd.
Lenexa, KS 66219

Sarah LaBoda, Esquire (via overnight mail)
Office of Regional Counsel
Region 7
11201 Renner Blvd.
Lenexa, KS 66219
Laboda.Sarah@epa.gov

John Walter, Esquire
Vice President, General Counsel, and Secretary
10 East Cambridge Circle Drive, Suite 250
Kansas City, KS 66103
jwalter@cvrenergy.com

Janice DeVelasco
Vice President, EH&S
2277 Plaza Drive, Suite 500
Sugar Land, TX 77479
jtdevelasco@cvrenergy.com

Dennis Irwin
PSM Manager
P.O. Box 1566
Coffeyville, KS 67337-0945
ddirwin@cvrenergy.com

LeAnn Johnson Koch, Esquire
Perkins Coie, LLP
700 13th Street N.W.
Washington, D.C. 20005
leannjohnson@perkinscoie.com



Civil Action No. 11-CV-1291-JTM-JPO
Section VIII
Paragraph 26, Reporting Requirements

Semi-Annual Report
September 1, 2016

Consent Decree Implementation Progress
Period through July 31, 2016
Confidential Business Information

Paragraph	Requirement	Requirement Due	Status
20	Implementation of Actions Necessary to Correct Non-Compliance	Implement no later than October 1, 2016	Ongoing See Attachment 1.
22.b.	Written Notice for Alky Scrap Metal	Provide written notice beginning no later than 60 days after the Effective Date	Ongoing Written notice continues to be provided to entities that receive scrap metal from the Alkylation unit.
23.c.	Implement PHA Recommendations	Implement no later than October 1, 2016	Ongoing See Attachment 2.

Program Audit

Item	Status	Completion Date
No Items Due this Reporting Period.		

Vessel Audit

Item	Status	Completion Date
18.(a)(1): Section 2 of Vessel Audit Report (updated inspection schedule)	Vessel inspections have been completed for Pressure Vessels following the requirements of API 510 based on corrosion rate and identified in schedule submitted in the Vessel Audit report.	Ongoing per inspection schedule.
18.(a)(3): Section 3 of Vessel Audit Report	Inspection documentation practices on track for completion by 10/1/2016. With regard to one vessel (coker), in lieu of completing file review, CRRM elected to replace the vessel completely. Completion of vessel replacement expected 10/16. Document repair activities to contain sufficient documentation or an R1 designating material, NDE performed or PWHT requirements.	Ongoing, expected completion October 2016.

HF Audit

Requirement	Action for "Shall" Requirements	Action for "Should" Requirements	Completion Date and Status
3.1 General			
	Develop comprehensive written inspection and testing procedures.		Completed 8/2/16

PHA - HF Alkylation Unit				
Item	PHA Recommendation	Target Date	Status	Completion Date
	No items due this reporting period.			